

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED _____
	:	
KAREEM NELSON,	:	VIOLATION:
a/k/a "Goat"	:	21 U.S.C. § 846
	:	(Conspiracy to possess with intent to
	:	distribute 50 grams or more of
	:	cocaine base ("crack") - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about January 2001, to on or about September 25, 2002, at Easton, in the Eastern District of Pennsylvania, and elsewhere, defendant

KAREEM NELSON,
a/k/a "Goat"

conspired and agreed, with others known and unknown to the grand jury, to knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS

2. It was part of the conspiracy that defendant KAREEM NELSON supplied "crack" cocaine base, heroin, marijuana, and cocaine powder that was to be cooked into "crack" cocaine base, to members of a drug organization that distributed cocaine base ("crack") and heroin, as

well as other controlled substances, including cocaine, marijuana, 3, 4 methylenedioxymethamphetamine (MDMA, known as “ecstasy”), and phencyclidine (PCP) from various locations in and around Easton, Pennsylvania.

It was further a part of the conspiracy that:

3. Defendant KAREEM NELSON supplied bulk cocaine, heroin, and other controlled substances, in New York, to a person known to the grand jury, who in turn transported those controlled substances to the Easton area for processing and distribution.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere, by at least one member of the conspiracy:

1. On or about July 30, 2002, defendant KAREEM NELSON agreed to supply a person known to the grand jury with unspecified quantities of heroin and “crack” cocaine base on the following day, in New York.

2. On or about August 2, 2002, defendant KAREEM NELSON quoted prices for controlled substances to a person known to the grand jury.

3. On or about August 4, 2002, defendant KAREEM NELSON stated to a person known to the grand jury that he could bring cocaine to Easton, in a quantity that is “enough for you.”

4. On or about August 7, 2002, defendant KAREEM NELSON and a person known to the grand jury discussed selling drugs together, and the risk of losing drug money.

5. On or about August 9, 2002, defendant KAREEM NELSON told a person known to the grand jury, from Easton, that NELSON would have controlled substances ready to be picked up in New York.

6. On or about August 10, 2002, defendant KAREEM NELSON and a person known to the grand jury discussed NELSON bringing wholesale amounts of controlled substances to Easton, where they would sell them, and discussed the risk of losing \$13,000.

7. On or about August 11, 2002, defendant KAREEM NELSON discussed selling drugs in Easton with a person known to the grand jury, agreed to deliver controlled substances to persons known to the grand jury, and expressed hope that they could all get rich selling those drugs.

8. On or about August 12, 2002, defendant KAREEM NELSON told a person known to the grand jury that NELSON planned to bring “workers” with him from New York, to sell drugs for them in Easton, and that he was waiting for his supplier.

9. On or about August 18, 2002, defendant KAREEM NELSON told a person known to the grand jury that NELSON had heroin, to which he referred as “dizzy,” but not “crack” cocaine base, to which he referred as “kizzy,” to sell that day.

10. On or about August 22, 2002, defendant KAREEM NELSON and a person known to the grand jury discussed NELSON bringing wholesale amounts of controlled substances to Easton, where they would sell them.

11. On or about August 24, 2002, defendant KAREEM NELSON told a person known to the grand jury that NELSON was waiting for a supply of “crack” cocaine base, which he referred to as “kizzy.”

12. On or about August 26, 2002, defendant KAREEM NELSON asked a person known to the grand jury to pick up NELSON in New York and to bring him to Pennsylvania, to sell controlled substances, including PCP.

13. On or about August 28, 2002, defendant KAREEM NELSON and a person known to the grand jury discussed the delivery of “bundles” of controlled substances from NELSON in New York to persons known to the grand jury in Easton.

14. On or about September 5, 2002, KAREEM NELSON agreed to supply a person known to the grand jury with controlled substances in New York, which were to be taken to Easton for processing and distribution.

15. On or about September 6, 2002, defendant KAREEM NELSON and a person known to the grand jury discussed making \$5,000 per day selling drugs in Easton.

All in violation of Title 21, United States Code, Section 846.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney